

Bell Atlantic

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Bruce P. Beausejour

General Counsel - Massachusetts

April 11, 2000

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
Commonwealth of Massachusetts
One South Station
Boston, Massachusetts 02110

Re: Bell Atlantic-Massachusetts, D.T.E. 99-271

Dear Ms. Cottrell:

Bell Atlantic-Massachusetts ("BA-MA") is responding to the "Motion of AT&T Communications of New England, Inc. to Adjust the Master Test Plan and to Clarify the Procedural Schedule" filed by AT&T on March 23, 2000 ("Motion"). The Motion reargues an earlier AT&T proposal that the KPMG Master Test Plan be revised to direct KPMG "to conduct its pre-order and order Volume Performance Test on the so-called LSOG 4 OSSs." Motion at 1. AT&T also proposes that the Department establish "a period of OSS commercial availability of at least 90 days" after the final KPMG report before the Department concludes its review. *Id.* AT&T's Motion should be denied.

AT&T's proposal to include the volume testing of Local Service Ordering Guidelines Release 4 ("LSOG 4") in the Master Test Plan has already been considered and rejected by the Department. *See* Department Letter Order on Final OSS Master Test Plan, issued November 19, 1999 ("Letter Order"). AT&T suggests that its proposal was rejected earlier only because it would delay the progress of the KPMG test and that this is no longer true. Motion at 2-3. AT&T is wrong. Certainly, the Department considered the time delay that would be involved in applying a transactional volume test to the LSOG 4 release in its Letter Order. However, the controlling factor in the Department's decision was that, while:

the features and functionality of a particular release obviously are important, but [these] are secondary to a BOC's demonstrated ability to manage system updates to wholesale interfaces in a non-discriminatory fashion. Put another way, software change is inevitable and iterative and will remain so. How a BOC responds to this inescapable fact is ultimately more important than the characteristics of any particular OSS software version. (Letter Order at 3.)

For this reason, the Department required that KPMG apply normal, high, and stress transaction testing to the current LSOG2/3 and GUI III pre-order and order interfaces and that KPMG apply a “new release” test, including the submission of a statistically significant sample of representative transactions in the test environment, to the LSOG 4 interfaces. Letter Order at 4. The Department’s reasoning was sound, and contrary to AT&T’s suggestion, nothing has changed that provides cause for the Department to modify the basis of KPMG testing.

AT&T also errs in arguing that applying volume testing to LSOG 4 would not delay the progress of the KPMG review at this time. Motion at 2. Currently, KPMG volume testing is expected to take place this month. As the Department correctly noted earlier, the implementation of the LSOG 4 features and functionality that AT&T has requested will not be completed until Bell Atlantic’s June 2000 software release. Letter Order at 3. Although these will be made part of the “new release” testing ordered by the Department, the post-release volume testing, analysis and reporting that AT&T proposes would obviously delay the expeditious resolution of the KPMG review.

AT&T’s argument for its second proposal is similarly flawed. AT&T claims that a specific 90-day period should be built into this proceeding after the KPMG report in order for the Department to observe BA-MA’s OSS performance in commercial operation. Motion at 3-4. AT&T attempts to draw support for its proposal by pointing to a review plan developed in Pennsylvania. Motion at 3. There, the 90-day period was adopted to allow “for ‘real world’ actual experience with commercially available OSS.” *Id.* But AT&T knows well that the Bell Atlantic systems that serve Massachusetts, New York and the other “Bell Atlantic-North” States are operationally distinct from the OSS serving Pennsylvania. Moreover, the Bell Atlantic-North OSS serving Massachusetts have already been subjected to an unprecedented degree of prior testing and ongoing commercial order volume levels. CLECs are today placing approximately 12,000 LSR transactions and more than 10,000 preordering transactions per day over the Bell Atlantic-North OSS. Contrary to AT&T’s suggestion, there is no need for the Department to await the development of “real world inquiries and orders” – they are occurring now on the Bell Atlantic-North OSS. Indeed, the Department has already properly concluded that the Bell Atlantic-North OSS are currently serving “significant commercial activity.” *See* Department Letter Order on KPMG’s Proposed Scope Change to the Master Test Plan, issued February 16, 2000.

Moreover, unlike the situation in Pennsylvania at the time that Commission ordered such a period, substantial data on the operational performance of BA-MA’s OSS have already been filed with the Department and reviewed in this proceeding. There will be many months of data depicting actual commercial experience available to the Department – as well as the results of the KPMG testing – before the Department is called upon to advise the FCC of its views concerning BA-MA’s satisfaction of this checklist item. Thus, the Department already has in place the procedures required for it to observe the results of LSOG 4 in production whenever it is employed by CLECs in Massachusetts.

AT&T's proposal is merely an attempt to delay BA-MA's entry into the long distance market. There is no need to add an additional 90-day period to the end of these proceedings as AT&T proposes.¹

AT&T also attempts to support its proposal by reference to "recent experience in New York." Motion 3-4.² AT&T does not mention the fact that Bell Atlantic has implemented a new EDI-ordering architecture that substantially increased system capacity and replaced the software that was the source of much of the earlier system instability. Nor does AT&T acknowledge that Bell Atlantic-New York ("BA-NY") has addressed these OSS issues in detail with the New York Public Service Commission and the Federal Communications Commission, and has agreed with the regulatory authorities on a set of reports that measure BA-NY's current performance in handling CLEC orders. These reports show that the steps already taken by BA-NY have been effective in eliminating the "problems" referred to by AT&T.

¹ AT&T also suggests that the Department has determined the procedures to be employed following KPMG's testing and certification of the record by BA-MA including technical sessions, evidentiary hearings, cross-examination of BA-MA and KPMG witnesses, and additional submissions by CLECs. Motion at 4-5. Contrary to AT&T's claim, the Department has not determined the procedures it will use for the remainder of this inquiry.

² AT&T's claim that the OSS "collapsed" in New York is a gross exaggeration. The problems in New York were with the return of certain notices that inform wholesale customers who use the EDI order interface of the status of their orders. These notices include acknowledgements, confirmations and completion notices. Although a significant number of these notifiers were delayed due to a problem in vendor-supplied software, the vast majority of the underlying orders proceeded through the provisioning and billing completion steps in a timely manner, and CLEC end-users were in fact being provided the service they ordered. In fact, since January 2000, Bell Atlantic processed almost one million local service requests for competitors in New York. The problems with returning status notifiers commanded the full attention of Bell Atlantic and its outside vendors. Teams of Bell Atlantic information technology and systems employees worked around the clock for weeks to resolve the issues. The teams were successful.

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In short, the scope of the KPMG Master Test Plan is appropriate and already provides for a robust, third-party test in Massachusetts. AT&T has not shown either that the Department should revise the Master Test Plan or extend the procedural schedule for this proceeding. The Motion should be denied.

Sincerely,

Bruce P. Beausejour

cc: Chairman James Connelly, Esq.
Commissioner W. Robert Keating
Commissioner, Deirdre K. Manning
Commissioner Eugene J. Sullivan, Jr.
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Hearing Officer Cathy Carpino
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